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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS AND
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS EXTENDING TIME TO
RESPOND TO APPLICATION OF OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER
PURSUANT TO 11 U.S.C. §§ 328(A) AND 1103
AND FED. R. BANKR. P. 2014(A) FOR
AUTHORIZATION TO RETAIN AND
EMPLOY FTI CONSULTING, INC AS
FINANCIAL ADVISOR NUNC PRO TUNC
TO FEBRUARY 12, 2019**

Re: Dkt. No. 1212

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee
4 of Unsecured Creditors (the “**Creditors Committee**”), on the other. The Debtors and the
5 Creditors Committee are referred to in this Stipulation and Agreement for Order collectively as
6 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On April 3, 2019, the Creditors Committee filed the *Application of the Official*
9 *Committee of Unsecured Creditors for Entry of an Order Pursuant to 11 U.S.C. §§ 328(a) and*
10 *1103 and Fed. R. Bankr. P. 2014(a) for Authorization to Retain and Employ FTI Consulting, Inc*
11 *as Financial Advisor Nunc Pro Tunc to February 12, 2019* [Dkt. No. 1212] (the “**UCC’s FTI**
12 **Retention Application**”), which is set for a hearing before the Court at 9:30 a.m. on April 24,
13 2019. Any response or opposition to the UCC’s FTI Retention Application is due by 4:00 p.m.
14 (Pacific Time) on April 17, 2019.

15 B. Counsel for the Debtors has requested, and proposed counsel for the Creditors
16 Committee has agreed, that the time for the Debtors to respond to the UCC’s FTI Retention
17 Application be extended.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
22 **THAT:**

23 1. The time for the Debtors to file and serve any response or opposition to the UCC’s
24 FTI Retention Application is extended through 4:00 p.m. (Pacific Time) on April 19, 2019.

25 *[Signatures on next page]*
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Dated: April 17, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim

Jane Kim

*Attorneys for Debtors
and Debtors in Possession*

Dated: April 17, 2019

MILBANK LLP

/s/ Thomas R. Kreller

Thomas R. Kreller

*Proposed Attorneys for Official Committee
of Unsecured Creditors*